

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169

James I. Stang, Esq. (CA Bar No. 94435)
Shirley S. Cho, Esq. (CA Bar No. 192616)
Werner Disse, Esq. (CA Bar No. 143458)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd., 11th Floor
Los Angeles, California 90067-4100
Telephone: 310/277-6910
Facsimile: 310/201-0760
Email: jstang@pszjlaw.com
scho@pszjlaw.com
wdisse@pszjlaw.com

E-File: June 28, 2011

Zachariah Larson, Esq. (NV Bar No. 7787)
LARSON & STEPHENS
810 S. Casino Center Blvd., Ste. 104
Las Vegas, NV 89101
Telephone: 702/382.1170
Facsimile: 702/382.1169
Email: zlarson@lslawnv.com

Attorneys for Reorganized Debtors and
Debtors in Possession

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

THE RHODES COMPANIES, LLC, aka
"Rhodes Homes, et al.,¹
Debtors.

Case No.: BK-S-09-14814-LBR
(Jointly Administered)
Chapter 11

¹ The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

Affects:

- ☐ All Debtors
☒ Affects the following Debtor(s)
Bravo, Inc. 09-14825

NOTICE OF ENTRY OF ORDER

TO: ALL INTERESTED PARTIES:

YOU ARE HEREBY NOTICED that an **ORDER GRANTING SCHEDULING STIPULATION RE REORGANIZED DEBTORS' OBJECTION TO CLAIM NO. 7 FILED BY THE INTERNAL REVENUE SERVICE AGAINST DEBTOR BRAVO, INC. [RE: DOCKET NO. 1377]** was entered on June 22, 2011. A copy of the Order is attached hereto.

DATED this 23rd day of June, 2011.

LARSON & STEPHENS

/s/ Zachariah Larson, Esq.
Zachariah Larson, Bar No. 7787
Shara Larson, Bar No. 7786
810 S. Casino Center Blvd., Suite 104
Las Vegas, NV 89101
Attorneys for Reorganized Debtor

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169



Entered on Docket
June 22, 2011

Hon. Linda B. Riegler
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

THE RHODES COMPANIES, LLC, aka
"Rhodes Homes, et al.,¹
Debtors.

Case No.: BK-S-09-14814-LBR
(Jointly Administered)

Chapter 11

Hearing Date: June 24, 2011
Hearing Time: 1:30 p.m.
Courtroom 1

Affects:

- ☐ All Debtors
☒ Affects the following Debtor(s):

Bravo, Inc. 09-14825

**ORDER GRANTING SCHEDULING STIPULATION RE REORGANIZED DEBTORS'
OBJECTION TO CLAIM NO. 7 FILED BY THE INTERNAL REVENUE SERVICE
AGAINST DEBTOR BRAVO, INC. [DOCKET NO. 1377]**

Upon consideration of the *Scheduling Stipulation Re Reorganized Debtors' Objection to Claim No. 7 Filed by the Internal Revenue Service Against Debtor Bravo, Inc. [Docket No. 1433]* (the "Scheduling Stipulation"), filed by above-captioned reorganized debtors (the

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, if applicable, are: Heritage Land Company, LLC (2918); The Rhodes Companies, LLC (3060); Rhodes Ranch General Partnership (1760); Tick, LP (0707); Glynda, LP (5569); Chalkline, LP (0281); Batcave, LP (6837); Jackknife, LP (6189); Wallboard, LP (1467); Overflow, LP (9349); Rhodes Ranch Golf and Country Club (9730); Tuscany Acquisitions, LLC (0206); Tuscany Acquisitions II, LLC (8693); Tuscany Acquisitions III, LLC (9777); Tuscany Acquisitions IV, LLC (0509); Parcel 20 LLC (5534); Rhodes Design and Development Corp. (1963); C&J Holdings, Inc. (1315); Rhodes Realty, Inc. (0716); Jarupa LLC (4090); Elkhorn Investments, Inc. (6673); Rhodes Homes Arizona, LLC (7248); Rhodes Arizona Properties, LLC (8738); Tribes Holdings LLC (4347); Six Feathers Holdings, LLC (8451); Elkhorn Partners, A Nevada Limited Partnership (9654); Bravo Inc. (2642); Gung-Ho Concrete, LLC (6966); Geronimo Plumbing, LLC (6897); Apache Framing, LLC (6352); Tuscany Golf Country Club, LLC (7132); Pinnacle Grading, LLC (4838).

1 "Reorganized Debtors"), requesting that the Court enter an order continuing the *Reorganized*
 2 *Debtors' Objection to Claim No. 7 Filed by the Internal Revenue Service Against Debtor Bravo,*
 3 *Inc. Pursuant to Sections 105, 502(b) and 505 of the Bankruptcy Code and Bankruptcy Rules*
 4 *3001, 3003 and 3007 (the "Claim Objection")*² [Docket No. 1377];

5 IT IS HEREBY ORDERED THAT:

6 1. The Scheduling Stipulation is granted.

7 2. The hearing on the Claim Objection is continued to September 27, 2011 at 10:30
 8 a.m.

9 3. The IRS shall produce certain documents requested by the Reorganized Debtors
 10 by July 30, 2011.

11 4. The IRS shall have 21 days prior to the continued hearing scheduled on the Claim
 12 Objection to file a response.

13 5. The Reorganized Debtors shall have 7 days prior to the continued hearing on the
 14 Claim Objection to file any reply.

15 6. This Court shall retain jurisdiction to hear and determine all matters arising from
 16 the implementation of this Order.

17 Submitted by:

18 DATED this 21st day of June, 2011

19 By: /s/ Zachariah Larson

20 LARSON & STEPHENS

21 Zachariah Larson, Esq. (NV Bar No 7787)

22 Kyle O. Stephens, Esq. (NV Bar No. 7928)

23 810 S. Casino Center Blvd., Ste. 104

24 Las Vegas, NV 89101

25 (702) 382-1170 (Telephone)

26 (702) 382-1169

27 zlarson@islawnv.com

28 *Attorneys for Reorganized Debtors*

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Claim Objection.

LR 9021 CERTIFICATION

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

☐ The court has waived the requirement set forth in LR 9021(b)(1).

☒ No party appeared at the hearing or filed an objection to the motion.

☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

Counsel appearing:

Unrepresented parties appearing:

Trustee:

☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

###

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169

CERTIFICATE OF SERVICE

1. On the ~~30~~²⁴th day of June 2011, I served the following document(s):

**NOTICE OF ENTRY OF ORDER GRANTING SCHEDULING STIPULATION RE
REORGANIZED DEBTORS' OBJECTION TO CLAIM NO. 7 FILED
BY THE INTERNAL REVENUE SERVICE AGAINST DEBTOR BRAVO, INC.
[RE: DOCKET NO. 1377]**

2. I served the above-named document(s) by the following means to the persons as listed below:

(check all that apply)

- • a. **United States mail, postage fully prepaid**
(List persons and addresses. Attach additional paper if necessary)

PLEASE SEE ATTACHED.

3. On **June 24, 2011** I served the above-named document(s) by the following means to the persons as listed below:

(check all that apply)

- • a. **ECF System** *(You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary)*

I declare under penalty of perjury that the foregoing is true and correct.

Signed on (date): June 24, 2011

Sophia L. Lee

(Name of Declarant)

/s/Sophia L. Lee

(Signature of Declarant)

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169

ECF SERVICE LIST

09-14814-lbr Notice will be electronically mailed to:

KEVIN N. ANDERSON on behalf of Creditor JAMES RHODES
kanderson@fabianlaw.com, sburdash@fabianlaw.com

BRETT A. AXELROD on behalf of Creditor SAGEBRUSH ENTERPRISES, INC.
baxelrod@foxrothschild.com,
pkois@foxrothschild.com;rditrich@foxrothschild.com;msheffield@foxrothschild.com;ldupree
@foxrothschild.com

J. THOMAS BECKETT on behalf of Creditor CREDITORS COMMITTEE
ECF@parsonsbehle.com

SHIRLEY S. CHO on behalf of Debtor THE RHODES COMPANIES, LLC
scho@pszjlaw.com

JANET L. CHUBB on behalf of Creditor COMMERCE ASSOCIATES, LLC
bsalinas@armstrongteasdale.com;twaldo@armstrongteasdale.com

DAVID A. COLVIN on behalf of Creditor DANA KEPNER COMPANIES, LLC
dcolvin@marquisaurbach.com,
mwalters@marquisaurbach.com;kgallegos@marquisaurbach.com;tszostek@marquisaurbach.co
m

THOMAS E. CROWE on behalf of Creditor SHANE SMITH
tcrowelaw@yahoo.com

DAMON K. DIAS on behalf of Creditor X-It at 215, LLC
ddias@diaslawgroup.com, bankruptcy@diaslawgroup.com

RICHARD I. DREITZER on behalf of Creditor Inc. Integrity Masonry
richard.dreitzer@bullivant.com

PHILIP S. GERSON on behalf of Creditor CLARK COUNTY
banknv@rocgd.com, mburgener@rocgd.com

REW R. GOODENOW on behalf of Creditor CREDITORS COMMITTEE
ecf@parsonsbehle.com

KIRBY C. GRUCHOW on behalf of Creditor NEVADA POWER COMPANY
hkelley@leachjohnson.com

CAROL L. HARRIS on behalf of Creditor In re Kitec Fitting Litigation Class Plaintiffs
c.harris@kempjones.com, jlm@kempjones.com

RODNEY M. JEAN on behalf of Creditor Credit Suisse, Cayman Islands Branch
RJEAN@LIONELSAWYER.COM,
gbagley@lionelsawyer.com;bklsclv@lionelsawyer.com;mstow@lionelsawyer.com;mtieu@lione

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169

lsawyer.com

ROBERT R. KINAS on behalf of Creditor CATERPILLAR FINANCIAL SERVICES CORPORATION

rkinas@swlaw.com,
jmath@swlaw.com;mfull@swlaw.com;cdossier@swlaw.com;lvdocket@mindspring.com;nbaig@swlaw.com;nunzueta@swlaw.com

KEITH S. KNOCHER on behalf of Creditor VALERIE SILVAS
law@lawyersinazona.com, bank@lawyersinazona.com

BART K. LARSEN on behalf of Creditor Reef Colonial, LLC
blarsen@klnevada.com, jierien@klnevada.com;bankruptcy@klnevada.com

ZACHARIAH LARSON on behalf of Debtor APACHE FRAMING, LLC
ecf@lslawnv.com, sstanton@lslawnv.com;akosina@lslawnv.com

NILE LEATHAM on behalf of Creditor STEERING COMMITTEE OF SENIOR SECURED LENDERS

nleatham@klnevada.com, ckishi@klnevada.com;bankruptcy@klnevada.com

CHARLES M. LITT on behalf of Creditor THE PRESERVE AT ELKHORN SPRINGS HOMEOWNERS ASSOCIATION, INC.

rblack@feinberggrant.com, efilings@hotmail.com

ANNE M. LORADITCH on behalf of Creditor JAMES RHODES
aloraditch@foxrothschild.com, pkois@foxrothschild.com;rdittrich@foxrothschild.com

VIRGINIA CRONAN LOWE on behalf of Creditor UNITED STATES OF AMERICA - INTERNAL REVENUE SERVICE

virginiacronan.lowe@usdoj.gov, Western.Taxcivil@usdoj.gov

JAMES B MACROBBIE on behalf of Creditor CREDIT SUISSE, CAYMAN ISLANDS BRANCH

darhyl.kerr@dlapiper.com

JANIECE S MARSHALL on behalf of Creditor STANLEY CONSULTANTS, INC.

jm@amclaw.com, car@amclaw.com;lom@amclaw.com;crb@amclaw.com;cs@amclaw.com

EDWARD M. MCDONALD on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11

edward.m.mcdonald@usdoj.gov

SUSAN L. MYERS on behalf of Creditor Credit Suisse, Cayman Islands Branch

smyers@lionelsawyer.com, gbagley@lionelsawyer.com;bklscv@lionelsawyer.com

JEFFREY D. OLSTER on behalf of Creditor HARSCH INVESTMENT PROPERTIES - NEVADA, LLC

olster@lbbslaw.com, sallade@lbbslaw.com

ERIC RANSVAGE on behalf of Creditor Leslie Blasco, et al.

eransavage@ssllplaw.com, agutierrez@ssllplaw.com

LARSON & STEPHENS
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
Tel: (702) 382-1170 Fax: (702) 382-1169

1 MARK R. SOMERSTEIN on behalf of Creditor WELLS FARGO BANK, N.A.
2 mark.somerstein@ropesgray.com
3 JEFFREY R. SYLVESTER on behalf of Creditor CREDIT SUISSE, CAYMAN ISLANDS
4 BRANCH
5 jeff@sylvesterpolednak.com
6 U.S. TRUSTEE - LV - 11
7 USTPRegion17.lv.ecf@usdoj.gov
8 DONALD H. WILLIAMS on behalf of Creditor Westar Kitchen & Bath, LLC
9 DonaldHWilliamsLaw@gmail.com, taylor sellers@gmail.com
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28